

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FERESHTEH KESHAVARZ,
A # 088 908 661,

Plaintiff,

v.

EMILIO GONZALEZ, in his official
capacity as Director of U. S.
Citizenship & Immigration Services,

MICHAEL JAROMIN, in his official
capacity as District Director of the
Kansas City District Office, U. S.
Citizenship & Immigration Services,

CHESTER MOYER, in his official
capacity as Field Office Director¹ of the
St. Louis, Missouri Sub-Office, U. S.
Citizenship & Immigration Services,

Defendants.

Case No. 4:09CV00619 RWS

JOINT MOTION FOR ENLARGEMENT OF TIME

COME NOW Plaintiff Fereshteh Keshavarz, by and through her undersigned counsel, and all Federal Defendants, by and through their undersigned counsel, and hereby jointly move for an Enlargement of Time in which to file a response in this lawsuit:

Defendants have been working on the adjudication process of Plaintiff's I-140 Petition for Immigrant Worker and I-485 Application for Adjustment of Status. Plaintiff's I-140 has finally been approved on July 22, 2009. **See Ex. A.** The adjudication process for Plaintiff's I-485 is still not complete, and therefore, the parties respectfully move for additional time, up to

¹ Chester Moyer was formerly title Officer in Charge; his current title is Field Office Director.

and including August 21, 2009 in which to file a response.

Respectfully submitted,

JEFFREY B. JENSEN
Acting United States Attorney

/s/ James O. Hacking, III

JAMES O. HACKING, III
King, Krehbiel, Hellmich, Hacking &
Borbonus, LLC
2000 S. Hanley Road
St. Louis, MO 63144
(314) 646-0099
(314) 646-1122 fax
Email: jhacking@khhhb.com

Attorneys for Plaintiff

/s/ Jane Rund

JANE RUND #47298
Assistant United States Attorney
111 South Tenth St., Room 20.333
St. Louis, MO 63102
(314) 539-2200
(314) 539-2777 fax
Email: Jane.Rund@usdoj.gov

Attorneys for Defendants